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February 8, 2022

The Honorable Craig T. Goldblatt, U.S.B.J.
United States Bankruptcy Court for the District of Delaware
824 Market Street. N.
3rd Floor, Courtroom 7
Wilmington, DE 19801

Re: Team Systems International, LLC - Ch. 11 No. 22-10066-CTG – *Request for Emergency Zoom Scheduling Conference*

Dear Judge Goldblatt:

Creditors, GPDEV and Simons (“**Creditors**”) respectfully request that tomorrow’s hearing be adjourned and that today’s briefing deadline be moved accordingly.

As your Honor knows, Creditors were only able to depose the Debtor yesterday, Monday February 7, 2022, due to the late and still incomplete document productions by the Debtor.

The Debtor’s deposition yesterday lasted for approximately 7 hours and did not end until around 7:45 pm. last night

After Debtor’s counsel logged off of the zoom deposition, the Court reporter, Ms. Ecker from Tate & Tate informed Creditors’ counsel that, because of the late hour and length of the deposition, a final transcript of the deposition would not be available by tomorrow’s hearing.

Also, Creditors have reason to believe that, during the course of yesterday’s deposition, the Debtor, through its corporate representative Deborah Mott, committed perjury. Specifically Ms. Mott testified that certain transfers of funds from the Debtor’s bank account ending 7965 to the Tunnell & Raysor law firm in the amount of \$25,000 on June 4, 2019, and \$928,843.10 on July 10, 2019, were related to “professional services” and not related to the purchase of a property on July 22, 2019 located [20 Addy Road, Bethany Beach, DE 19930](#), by Addy Road, LLC, a Florida

limited liability company owned by Deborah Mott. Ms. Mott's testimony was that the Tunnell & Raysor law firm provided litigation consulting for the Florida litigation.

Since the conclusion of last night's deposition, however, Creditors contacted the Tunnell & Raysor law firm. And, Tunnell and Raysor confirmed that they have never provided any legal services for the Debtor. Instead, Tunnell & Raysor's only connection with the Debtor, if any, is that they assisted Addy Road, LLC and Ms. Mott with the purchase of the Addy Road property.

In light of the foregoing, Creditors need additional time before the hearing on their motion to dismiss so that they can: (i) obtain a final transcript of the debtor's deposition; (ii) finalize their brief in support of the motion with details from yesterday's deposition; and (iii) seek discovery from Tunnell and Raysor to confirm the nature and extent of services provided to the Debtor and/or Addy Road LLC.

Creditors have reached out to the Debtor today through counsel (both over the phone and through email) to discuss this request and scheduling going forward.

But, Creditors have not yet receive a response from Debtor's counsel.

In light of the foregoing, Creditors respectfully request a zoom scheduling conference before your Honor today.

Respectfully,

/s/ Jenny R. Kasen

JENNY R. KASEN

JRK:jk

Via ECF

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